

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

**UNITED SOVEREIGN
AMERICANS, INC. et. al.,**

Petitioners,

V.

MERRICK GARLAND, et. al.;

Defendants.

Civil No: 1:24-CV-01003

Chief Magistrate Judge Bloom

(Electronically Filed)

MOTION TO DISMISS PETITION

Defendant, Merrick Garland, asks this Court to dismiss the Petition pursuant to Fed. R. Civ. P. 12(b).

A brief in support of this motion will be filed in accordance with M.D. Pa. Local Rule 7.5.

Counsel certifies that he has sought the concurrence of Petitioners' counsel pursuant to M.D. Pa. Local Rule 7.1 and concurrence was denied.

Respectfully submitted,

GERARD M. KARAM
United States Attorney

/s/ Gerard T. Donahue
GERARD T. DONAHUE
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Attorneys for Defendants

Date: November 8, 2024'

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CERTIFICATE OF NON-CONCURRENCE

I, Gerard T. Donahue, Assistant United States Attorney, have contacted counsel for the Plaintiff, Tudor Neagu, Esq., who does not concur in the Defendants' motion.

Respectfully submitted,

GERARD M. KARAM
UNITED STATES ATTORNEY

/s/ Gerard T. Donahue
GERARD T. DONAHUE
Assistant U.S. Attorney

Dated: November 8, 2024

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers. That on November 8, 2024, she served a copy of the attached

MOTION TO DISMISS PETITION

by electronic service pursuant to Local Rule 5.7 and Standing Order 05-6 & 12.2 to all counsel of record in the above-captioned matter.

/s/ Stephanie Kakareka
STEPHANIE KAKAREKA
Legal Administrative Specialist